

John W. Ursu  
Partner  
[john.ursu@faegredrinker.com](mailto:john.ursu@faegredrinker.com)  
+1 612 766 8164 direct

**Faegre Drinker Biddle & Reath LLP**  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, Minnesota 55402  
+1 612 766 7000 main  
+1 612 766 1600 fax

July 2, 2020

The Honorable Susan Richard Nelson  
U.S. District Court for the District of Minnesota  
772 Federal Building  
316 N. Robert Street  
St. Paul, MN 55101

**Via Electronic Court Filing**

Re: *3M Company v. Starsiak et al., Case 0:20-cv-01314-SRN-DTS*

Your Honor:

As set forth in your Order dated June 26, 2020, the parties have met and conferred to address whether, and to what extent, limited jurisdictional discovery, on a mutual basis, will occur. By this letter, which all parties have agreed to, the parties advise the Court regarding the extent of discovery and the agreed-upon briefing schedule. The parties' agreement is as follows:

1. The parties shall each serve document requests and deposition notices on each other with documents to be produced July 17, 2020. 3M will also serve one subpoena on a third-party.

2. Depositions shall occur the week of July 27, 2020, with the following depositions to be taken, if the noticing party concludes such depositions are warranted, after reviewing the document productions:

- *For Plaintiff:* Matthew Starsiak, AMK Energy, and Eric Schuster;
- *For Defendants:* Haley Schaffer and 3M Company.

3. The current cross motions – Plaintiff's motion for a preliminary injunction and Defendants' motion to dismiss – shall be heard September 9, 2020, at 3:00 p.m.

4. The briefing schedule for these motions is as follows:

- *Opening briefs:* August 10, 2020;
- *Response briefs:* August 26, 2020;
- *Reply briefs:* September 2, 2020.

July 2, 2020

The parties acknowledge that, unless altered by the Court, the deadlines set above shall not be adjusted absent good cause shown.

Very truly yours,



John W. Ursu

c: All counsel of record via ECF